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January 5, 2024

By ECF

Hon. Victoria Reznik  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: Fishman v. City of New Rochelle  
19-CV-265 (NSR) (VR)

Dear Magistrate Judge Reznik:

The Quinn Law Firm represents defendant City of New Rochelle (“City”) in the above-referenced action. At the Court’s direction, we are submitting this letter, jointly with counsel for plaintiff, to advise regarding the status of discovery.

Earlier today I emailed plaintiff’s counsel asking whether he intended on taking any additional depositions and whether there was anything else on his agenda regarding discovery. Plaintiff’s counsel replied stating, in relevant part, “We are deeming discovery closed at this point.” The City likewise does not intend to pursue any additional discovery.

Respectfully submitted,

Lalit K. Loomba

Cc: Caner Demirayak, Esq.